

**County of Mendocino**  
**Air Quality Management District**  
Ukiah, California 95482

**Permit to Operate**

is Hereby Granted to

**Georgia Pacific West, Inc.**

for Equipment Located at:

90 West Redwood Avenue  
Fort Bragg, California

Subject to the Listed Conditions

Issue Date:

Permit No.

Valid Through:

\_\_\_\_\_  
Philip Towle  
Air Pollution Control Officer

\_\_\_\_\_  
Date

**Table of Contents**

Table of Contents.....	2
Abbreviations and Acronyms.....	3
Chapter 1 – General Provisions .....	4
Section I. General Permit Conditions .....	4
II. Permit Term.....	4
III. Compliance With Permit Conditions .....	4
IV. Fee Payment .....	5
V. Inspection and Entry .....	5
VI. Upsets and Breakdowns .....	5
VII. Certification of Compliance .....	6
VIII. Recordkeeping and Reporting .....	7
IX. Transfer of Ownership .....	8
X. Reopening for Cause.....	9
XI. Permit Modification .....	9
XII. Severability.....	9
XIII. Prohibitions .....	10
Chapter 2 – Equipment Lists .....	11
Section I. Sawmill Line .....	11
II. Planing Mill Line.....	11
III. Fence Line .....	12
IV. Powerhouse Line .....	12
V. Facility Support Systems.....	13
Chapter 3 – Equipment Specific Permit Conditions .....	17
Section I. Sawmill Line .....	17
II. Planer Mill Line.....	23
III. Fence Line .....	27
IV. Powerhouse Line .....	29
V. Plant Wide Special Conditions.....	40
<b>Figures</b>	
Sawmill Process Flow Diagram .....	14
Planer Mill Process Flow Diagram.....	15
Power Generation Process Flow Diagram .....	16

**List of Abbreviations**

<b>Acronym</b>	<b>Definition</b>
H&SC	California State Health and Safety Code
MCAQMD	Mendocino County Air Quality Management District
Auth.	Regulatory authority for a given permit condition
40 CFR	Title 40, Code of Federal Regulations
APCO	Air Pollution Control Officer
USEPA	United States Environmental Protection Agency
CEM	Continuous Emissions Monitor

## **Chapter 1 – General Provisions**

### **I. GENERAL PERMIT CONDITIONS**

- A. All equipment, facilities and systems installed or used to achieve compliance with the terms and conditions of this Permit to Operate shall at all times be maintained in good working order and be operated as efficiently as possible so as to minimize air pollutant emissions.

[Auth. §I(B): MCAQMD Regulation 1, Rule 240(d)(1)]

- B. In the event of any violation of District Rules and Regulations, PERMITTEE shall notify the District by telephone and take action to end such violation. Notification shall be as soon as possible, but no later than one (1) hour after its detection during normal office hours (8:00 am to 5:00 pm), or one (1) hour after the start of the next regular business day, whichever is sooner. PERMITTEE shall follow up with written notification and description of corrective action within two (2) weeks.

[Auth. §I(B): MCAQMD Regulation 5, Rule 450(b)]

- C. The exceedance of any limiting condition is prohibited without prior application for, and the subsequent granting of, an Authority to Construct permit and, if necessary, a Prevention of Significant Deterioration (PSD) Permit.

[Auth. §I(C): MCAQMD Regulation 1, Rule 200(a)]

- D. All conditions in this permit except Chapter III, Section V(D), are Federally enforceable.

### **II PERMIT TERM**

This permit shall be valid for 5 years from the date of issuance.

[Auth. §II: 40 CFR 70.6(a)(2); MCAQMD Regulation 5, Rule 5.660]

### **III COMPLIANCE WITH PERMIT CONDITIONS**

- A. PERMITTEE shall comply with all permit conditions. The non-compliance with any permit condition is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or denial of permit renewal.

[Auth. §III(A): 40 CFR 70.6(a)(6)(i); MCAQMD Regulation 5, Rule 5.610(g)(1)]

- B. This permit does not convey property rights or exclusive privilege of any sort.

[Auth. §III(B): 40 CFR 70.6(a)(6)(iv); MCAQMD Regulation 5, Rule 5.610(g)(2)]

- C. PERMITTEE shall not use the “need to hold or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition.

[Auth. §III(C): 40 CFR 70.6(a)(6)(ii), MCAQMD Regulation 5, Rule 5.610(g)(4)]

- D. A pending permit action or notification of anticipated noncompliance does not stay any permit condition.

[Auth. §III(D): MCAQMD Regulation 5, Rule 5.610(g)(5)]

- E. Within a reasonable time period, PERMITTEE shall furnish any information requested by the air pollution control officer (APCO) of Mendocino County Air Quality Management District, in writing, for the purpose of determining: 1)

compliance with the permit, or 2) whether or not cause exists for a permit or enforcement action.

[Auth. §III(E): 40 CFR 70.6(a)(6)(v)]

#### **IV FEE PAYMENT**

- A. Permit fees shall be paid in five installments, one due each year on the anniversary of the permit issuance. The first installment is due upon issuance of the permit.
- B. The permit fees for this permit shall be calculated equivalent to the existing annual permit fee structure of the District.
- C. The permit fees for this permit shall replace the existing annual permit fees imposed by the District

[Auth. §IV: Federal 40 CFR 70.6(a)(7); MCAQMD Regulation 5, Rule 5.670]

#### **V INSPECTION AND ENTRY**

PERMITEE shall allow the Air Pollution Control Officer, the Chairman of the California Air Resources Board, the Regional Administrator of the United States Environmental Protection Agency, and/or their authorized representatives, upon presentation of credentials, to do any of the following:

- A. To enter upon the premises where the source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
- B. At reasonable times, to have access to and copy any records necessary for the determination of emissions of pollutants to the air or required to be kept under the terms and conditions of this permit; and
- C. To inspect any equipment, operation, or subject in this permit; and
- D. To sample emissions from this source.

[Auth. §V: Federal 40 CFR 70.6(c)(2), MCAQMD Regulation 5, Rule 5.610(e)]

#### **VI UPSETS AND BREAKDOWNS**

- A. PERMITTEE shall notify the District by telephone of any failure of air pollution control equipment, process equipment, or of any abnormal operation which results in an increase in emissions above the allowable limits stated in the Permit Units Section of this permit. Notification shall be as soon as possible, but no later than one (1) hour after its detection during normal office hours (8:00 am to 5:00 p.m.), or one (1) hour after the start of the next regular business day, whichever is sooner. PERMITTEE shall follow up with written notification and description of corrective action within two (2) weeks.
- B. PERMITTEE shall report upsets and breakdowns to the District in accordance with Regulation 5, Rule 5.450 of the District.

[Auth. §VI: Federal 40 CFR 70.6(a)(3)(iii)(B); MCAQMD Regulation 5, Rule 5.450]

#### **VII CERTIFICATION OF COMPLIANCE**

- A. Compliance Certification

1. PERMITTEE shall submit compliance certification reports to the District for each calendar year. This report shall be submitted within 60 days of the end of each calendar year. The certification shall include:
  - a. Identification of each term or condition of the permit that is the basis of the certification,
  - b. compliance status,
  - c. the method used for determining compliance, and
  - d. whether the compliance monitoring method is a continuous method or an intermittent method.

[Auth. §VII(A)(1): Federal 40 CFR 70.6(c)(5)]

2. PERMITTEE shall use District approved forms for the compliance certification and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report.

[Auth. §VII(A)(2): Federal 40 CFR 70.6(b)(5); MCAQMD Regulation 5, Rule 5.650]

3. A copy of each compliance certification shall be submitted to the Administrator, USEPA Region 9. The submittal address is:

USEPA Region 9  
Air Division (AIR-3)  
75 Hawthorne Street  
San Francisco, CA 94105-3901

[Auth. §VII(A)(3): Federal 40 CFR 70.6(c)(5)(iv)]

#### B Compliance Plan

1. PERMITTEE will continue to comply with those permit conditions with which it is in compliance.

[Auth. §VII(B)(1): Federal 40 CFR 70.5(c)(8)(iii)(A)]

2. PERMITTEE shall comply with all federally enforceable requirements that become applicable during the permit term, in a timely manner.

[Auth. §VII(B)(2): Federal 40 CFR 70.6(c); MCAQMD Regulation 5, Rule 5.630]

### VIII RECORDKEEPING AND REPORTING

#### A. Log books

1. Separate logbooks or other records shall be kept on site and contain the information required and described in each equipment subsection (6) under Section IV – Equipment Specific Permit Conditions.

[Auth. §VIII(A)(1): MCAQMD Regulation 5, Rule 5.455(c)]

2. PERMITTEE will maintain a record of all required monitoring. The record shall include:

- a. The date, place, and time of sampling or measurement,
- b. The date the analyses were performed,
- c. The company that performed the analyses

- d. The analytical techniques or methods used
  - e. The results of such analyses, and
  - f. The operating conditions existing at the time of sampling or measurement.  
[Auth. §VIII(A)(2): Federal 40 CFR 70.6(a)(3)(ii)(A)]
3. The recorded information shall be retained for at least five years from date of initial entry, and shall be made available to the District's inspector upon request.  
[Auth. §VIII(A)(3): Federal 40 CFR 70.6(a)(3)(ii)(B)]

**B. Excess Emissions**

1. PERMITTEE shall notify the District of any upset conditions, breakdown, scheduled maintenance or any changes in operation or process which causes a violation of emission limitations prescribed by this permit, by District Rules and Regulations, or by State law, or which involves the operability of in-stack monitoring equipment. Notice shall be given as soon as reasonably possible but no later than one (1) hour after its detection during normal business hours. The completion of corrective measures or the shut down of emitting equipment is required within 48 hours of the occurrence of a breakdown condition (96 hours for in-stack monitoring equipment).
2. PERMITTEE shall submit a written report of all excess emissions to the APCO biannually. The reporting periods shall be January through June and July through December. Each report shall be submitted within 30 days of the end of the biannual period and include the following:
  - a. The magnitude of excess emissions, the method of computation, any conversion factors used, and the date and time of commencement and completion of each time period of excess emissions. If CEM data is available, then computation shall be in accordance with 40 CFR 60.13(h).
  - b. Specific identification of each period of excess emissions (emissions greater than those allowed during normal operation not including start-up, shutdown, and malfunction) that occurs during startup, shutdown, and malfunctions of the boiler systems. The nature and cause of any malfunction (or probable cause of the malfunction, if unknown) and the corrective action taken or preventative measures adopted shall also be reported.
  - c. When no excess emissions have occurred, such information shall be stated in the report.
  - d. Excess emissions shall be defined as those exceeding the limits established for normal operation (not start-up or shutdown) in the Permit Units Section of this Permit.  
[Auth §VIII(B): Federal 40 CFR 70.6(a)(6)(v), MCAQMD Regulation 5, Rule 5.610(g)(6)]

**C. Deviation from permit requirements**

1. PERMITTEE shall report any deviation from requirements in this Permit to Operate, other than deviations related to excess emissions, to the APCO within 24 hours.
2. PERMITTEE shall submit a written monitoring report which summarizes monitoring data for the reporting period and reports all deviations from permit requirements, including deviations attributable to upset conditions, to the APCO every six months. The reporting periods shall be January through June and July through December. These reports shall be submitted within 30 days of the end of each reporting period.
3. PERMITTEE shall use District approved forms for the report regarding deviation from permit requirements and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report. When no deviations have occurred for the quarter, such information shall be stated in the report.

[Auth. §VIII(C): 40 CFR 70.6(a)(3)(iii); MCAQMD Regulation 5, Rule 5.625]

#### **IX TRANSFER OF OWNERSHIP {District}**

This permit is not transferable. In the event of any change in control or ownership of the facilities operated pursuant to this permit, the permit shall be deemed null and void, and PERMITTEE shall surrender it to the District. PERMITTEE shall notify the succeeding owner/operator of the existence of this permit and its conditions by letter, a copy of which shall be sent to the Air Pollution Control Officer. (The new owner/operator will be responsible to arrange for re-issuance of this permit in his/her name.)

[Auth. §IX: MCAQMD Regulation 1, Rule 240(j)]

#### **X REOPENING FOR CAUSE**

- A. This permit may be modified, revoked, reopened, or terminated for cause.  
[Auth. §X(A): 40 CFR 70.7(f)(2); MCAQMD Regulation 5, Rule 5.570(a)]
- B. This permit shall be reopened and revised if:
  1. Additional requirements become applicable, and more than three years remain on the term of the permit.
  2. Additional acid rain requirements become applicable to the source.
  3. The permit contains a material mistake or inaccurate statements were made in establishing terms or conditions of the permit.
  4. The permit must be revised or revoked to assure compliance with applicable requirements.  
[Auth. §X(B): 40 CFR 70.7(f)(1); MCAQMD Regulation 5, Rule 5.570(b)]
- C. Filing of a request for permit action by PERMITTEE does not stay any permit condition.

[Auth. §X(C): 40 CFR 70.6(a)(6)(iii);]



**XI PERMIT MODIFICATION {District}**

An Authority to Construct application shall be obtained from the District prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required pursuant to the California Health and Safety Code, Section 42300.

[Auth. §**XII**: MCAQMD Regulation 1, Rule 200(a)]

**XII SEVERABILITY**

The provisions of this permit are severable, and, should any provision of this permit be held invalid, the remainder of this Permit shall not be affected thereby.

[Auth. §**XIII**: 40 CFR 70.6(a)(5); H&SC 41511; MCAQMD Regulation 5, Rule 5.610(h)]

**XIII PROHIBITIONS****A. Public Nuisance**

PERMITTEE shall meet all requirements of District Regulation 1, Rule 400(a), with regard to public nuisance. **{District}**

[Auth. §**XIV**(A): H&SC 41700, MCAQMD Regulation 1, Rule 400(a)]

**B. Visible Emissions**

PERMITTEE shall meet all requirements of District Regulation 1, Rule 410, with regard to visible emissions. **{District}**

[Auth. §**XIV**(B): H&SC 41701, MCAQMD Regulation 1, Rule 410]

**C. Fugitive Dust Emissions –**

PERMITTEE shall meet all requirements of District Regulation 1, Rule 430, with regard to fugitive dust emissions. **{District}**

[Auth. §**XIV**(C): MCAQMD Regulation 1, Rule 430]

**D. Sulfur Oxide Emissions**

PERMITTEE shall meet all requirements of District Regulation 1, Rule 440, with regard to sulfur oxide emissions

[Auth. §**XIV**(D): MCAQMD Regulation 1, Rule 440]

**E. Circumvention –**

PERMITTEE shall meet all requirements of District Regulation 1, Rule 410, with regard to circumvention of District rules and regulations. **{District}**

[Auth. §**XIV**(E): MCAQMD Regulation 1, Rule 400(b)]

**F. Open Burning –**

PERMITTEE shall meet all requirements of District Regulation 2, with regard to open burning. **{District}**

[Auth. §**XIV**(F): MCAQMD Regulation 2]

**G. Title VI, Stratospheric Ozone Protection –**

PERMITTEE shall meet all requirements of 40 CFR 82 Subpart F for the recycling and emissions reduction of ozone depleting substances.

[Auth. §XIV(G): Federal 40 CFR 70.2]

H. National Emissions Standard for Asbestos –

PERMITTEE shall meet all requirements of District Regulation 1, Rule 492 during the demolition or renovation of any structure containing asbestos materials.

[Auth. §**XIV**(H): Federal 40 CFR 70.2, MCAQMD Regulation 1, Rule 492]